

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DANIELA HELKOWSKI, individually and on behalf of all others similarly situated,)	Case No. 09-cv-609
)	
Plaintiff,)	Hon. Amy Reynolds Hay
v.)	
CLEARVIEW FEDERAL CREDIT UNION,)	Filed Electronically
)	
Defendant.)	

**JOINT MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

The Parties, by and through their undersigned counsel, respectfully move this Court for an Order preliminarily approving the terms of a proposed class action settlement; approving the form and method of providing notice of the settlement to the class; and scheduling a final hearing regarding the settlement. In support of this Motion, the Parties aver as follows:

1. After arms-length negotiations, the Parties have reached a proposed settlement of this putative class action. On or about May 3, 2010, the Parties executed a Class Action Settlement Agreement (“Settlement Agreement” or “Settlement”), a copy of which is attached hereto as Exhibit 1.
2. Consistent with the Memorandum of Law filed herewith, the Parties respectfully request that the Court sign the proposed Order preliminarily approving the terms of a proposed class action settlement; approving the form and method of providing notice of the settlement to the class; and scheduling a final hearing regarding the settlement.

WHEREFORE, the Parties hereby move this Court for an Order (1) preliminarily approving the terms of the Settlement as set forth in the Settlement Agreement; (2) approving the form of notice and the method of providing notice of the Settlement to the Class as set forth in the Settlement Agreement, and directing that said form of notice be provided to Class Members in that manner; and (3) scheduling a Final Settlement Hearing at which the request for final approval of the proposed Settlement, Plaintiff's Counsels' application for an award of attorneys' fees and costs, and for the entry of the Final Judgment and Order will be considered.

A proposed Order Preliminarily Approving the Class Settlement, Directing the Issuance of Notice to the Class and Scheduling a Settlement Hearing is attached to the Settlement Agreement as Exhibit "A."

Respectfully Submitted,

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